

VicHealth Position Statement
Food marketing directed to children
August 2007

1. Introduction

VicHealth considers the individual, social, economic, environmental and cultural determinants of health and wellbeing in its approach to promoting healthy eating. VicHealth's goal is to support processes within social structures, communities, and individuals to enable people to increase control over their lives in ways that achieve and maintain health.

VicHealth is committed to promoting healthy eating as identified in its *Strategic Direction 2006-2009*¹. This will build on VicHealth's significant contribution to promoting healthy eating in Victoria over the past twenty years.

2. Background

VicHealth envisages a community where health is a fundamental human right and where everyone shares in the responsibility for promoting health.

VicHealth is concerned about the high volume of unhealthy foods marketed to Victorian children and practices used by food companies to market these foods to children. Marketing of unhealthy food to children is pervasive and occurs in a range of contexts and through a variety of media, including television, cinema, magazine and internet advertising, direct mail, email, SMS, delivered brochures or flyers, sponsorship in schools and of children's sport, product placement, point of sale promotions, and product packaging and labelling. VicHealth believes the cumulative impact of this marketing sets children up for poor dietary patterns and longer term nutrition-related problems such as diabetes, obesity and poor dental health.

Children are a vulnerable audience deserving protection, and they have the right to be free from commercial exploitation. There is substantial evidence that children are highly susceptible to advertising and marketing because they lack the experience and cognitive ability necessary to assess advertising messages critically².

3. Definitions

VicHealth believes that “**healthy eating**” is not only about the consumption of healthy foods but also about the integral and enjoyable part of daily life that food offers³. This includes having regular access to culturally appropriate food and balancing this against the body's requirements for growth and development. Refer to the VicHealth [position paper on healthy eating](#) for more information.

For the purpose of this paper, “**Healthy food**” or “**Nutritious food**” is considered by VicHealth to be any food or non-alcoholic beverage which meets the eligibility criteria for making a health claim, as per the nutrient profile model proposed by Food Standards Australia New Zealand (FSANZ)^{4a}. The term “**unhealthy food**” is used to describe micronutrient poor, energy-dense (ie high in sugar, fat and salt) foods or non-alcoholic beverages.

“**Children's television viewing time**” is defined here as the times when children are likely to be watching; such as before and after school, weekend mornings and the peak viewing time of 6pm - 8.30pm on weekdays.

^a This model takes into account the positive nutritional characteristics of a food (such as fibre, protein and fruit/vegetable content) as well as the less desirable attributes (such as energy, saturated fat, sodium and total sugars). It is an adaptation of a model used in the UK by Ofcom to restrict television food advertising aimed at children. It has been modelled on over 10,000 Australian foods and is proposed by FSANZ as the system for determining eligibility of a product for a health claim under planned legislative changes to the Food Standards Code. Further refinement may be required to ensure consistency with the *Dietary Guidelines for Children and Adolescents*; however this model offers a robust and accessible framework for inclusion in legislation.

3. Children's food habits

Children's dietary habits have both immediate and long-term health effects. Nutritious foods are a resource for optimal growth, development and health throughout life and contribute to physical vitality, mental health and social wellbeing⁵⁻⁶. Australian childhood obesity rates are amongst the highest in the world, with the prevalence of overweight almost doubling and the prevalence of obesity tripling over the last ten years⁷. Whilst these trends have occurred across the social gradient evidence suggests the prevalence of overweight and obesity is higher in children of lower socio-economic status⁸⁻⁹.

Recent data highlights the importance of food intake in the energy-balance equation¹⁰. A study of 5,500 school children (aged 5-16) in NSW showed an improvement in physical activity levels between 1985 and 1997 despite an increased incidence of overweight and obesity¹¹. In contrast, energy consumption increased by 13-15% over the same time period, as explained by an increased consumption of energy dense foods rather than an increase in total food consumption¹².

The average volume of soft drink consumed annually by children and adults has increased from 47 litres per person in the 1970's to a current average of 113 litres per person per year¹³. Almost a quarter of children (aged 2-12) drink more soft drink every day than water and between 40-65% of children (aged 5-16) are consuming more than 250ml every day¹⁴⁻¹⁵. In addition, almost one in ten children (aged 2-12) are eating fries more than three times a week and that only 38% of 4-12 year olds are eating the recommended number of vegetables each day (2-3 serves)¹⁶.

It seems that while there appear to be differences in eating behaviours according to age, gender, socio-economic status, cultural background and rurality, these relationships aren't always significant (or predictable), reaffirming the need to consider children as a heterogeneous group and take a whole of population approach¹⁷.

4. Effects of food marketing on children

The World Health Organisation (WHO) has deemed food marketing a 'probable' causal factor in weight gain and obesity in children¹⁸. There is substantial evidence that food and beverage marketing influences children's product preferences and product consumption. Recent systematic reviews on the effects of food and beverage advertising to children have confirmed that advertising influences children's food preferences; food purchasing and consumption¹⁹⁻²⁰ as seen in Table 1.

Table 1: Impact of food marketing

	Institute of Medicine, 2006 ⁶⁴	Escalante de Cruz et al., 2004 ⁶⁷	Hastings et al., 2003 ³³	Dalmeny et al., 2003 ⁵⁹	McNeal, 1987 ⁶⁸
Children unaware of persuasive intent	✓	✓	✓	✓	✓
Influence food preferences	✓	✓	✓	✓	✓
Generate positive beliefs	✓	✓	✓	✓	✓
Influence purchase requests	✓	✓	✓	✓	✓
Influence consumption	✓	✓	✓	✓	✓

Source: Coalition on Food Advertising to Children (2006)

The Hastings Review (commissioned by the UK Food Standards Authority) was an extensive systematic review of 122 studies and concluded that there is sufficient evidence to say that these effects are not due to chance, that they are independent of other factors (such as parents' eating habits or attitudes) and that they influence the brand **and** the type of food children request²¹. In Australia 73% of 5-12 year olds influence the purchase of household grocery items²².

4. Extent and nature of food marketing in Australia

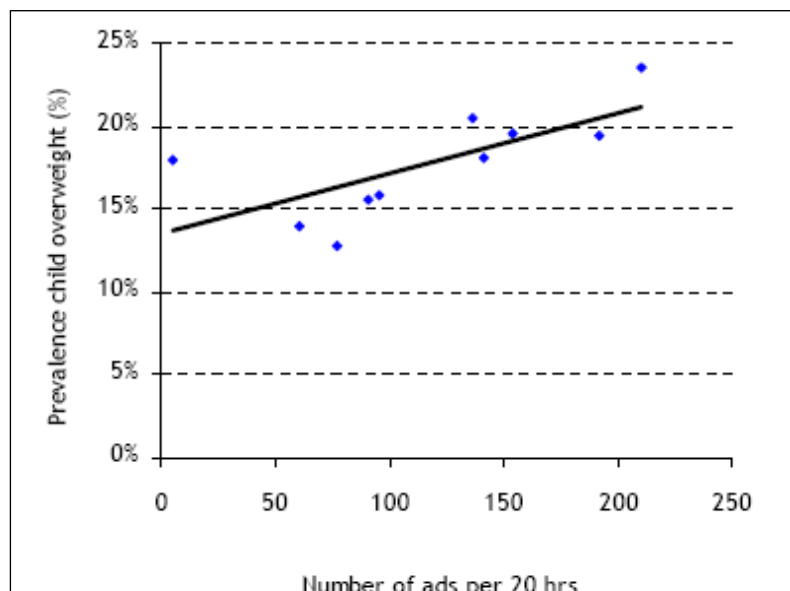
Food advertising is consistently a top revenue raiser for commercial free-to-air TV stations²³. A recent media buyers survey commissioned by Free TV Australia highlights that commercial free-to-air TV reaches 99% of Australian households and is considered by marketers to be the “cornerstone of an integrated campaign”, a medium that is “able to target all demographics” and the “best way to reach grocery buyers with children”²⁴.

A study comparing international food marketing trends in 1996 showed that Australia had one of the highest levels of television food advertising aimed at children in the world²⁵. Since that time, Australian studies have continued to confirm the high volume of food advertising during children’s viewing times^{26,27,28,29,30}. Food and beverage advertising is twice as common during children’s viewing hours compared to adult viewing times³¹. Children watching television during the weekday afternoon timeslot are subjected to approximately 14 food ads per hour³². For children (aged 5-12 years) watching the average of 2-3 hours of television daily, this means they are subjected to between 28-42 food advertisements every day.

Several studies have also shown that between 55% and 80% of food advertisements advertised during children’s viewing times are for unhealthy foods mostly confectionary or fast foods^{33,34,35}.

Data from the United States, Australia and eight European countries shows a significant association between the proportion of children overweight and the numbers of advertisements per hour shown on children’s television, especially those advertisements promoting energy-dense, micronutrient-poor foods (as seen in Figure 1).

Figure 1: Relationship between the volume of high fat, high sugar food advertisements and childhood overweight³⁶.



In addition to the volume of marketing, the content of claims can be misleading. Currently, food products are able to promote single nutritional attributes without disclosure of the product’s “less healthy” characteristics. For example, to claim a breakfast cereal contains eight vitamins and minerals including calcium for “strong bones” would be considered misleading, if the product contained 37% sugar

5. Australian regulatory system

Food marketing in Australia is regulated through legislation and industry codes of practice. *The Food Act 1984* (Vic), the *Fair Trading Act 1999* (Vic) and the *Trade Practices Act 1974* (Cth) contain provisions to protect consumers from misleading and deceptive conduct in connection with the sale of food. The *Australia New Zealand Food Standards Code* (given effect in Victoria by the *Food Act 1984* (Vic)) also contains requirements governing food labelling and the use of nutrition and health claims. However, non-compliance with these requirements is a systematic problem, largely a result of inadequate monitoring and enforcement.

Advertising to children on free-to-air commercial television is co-regulated by the Australian Communications and Media Authority (ACMA) under the *Children's Television Standards* and the free-to-air commercial television broadcasting industry under the *Commercial Television Industry Code of Practice*.

The *Children's Television Standards* are administered and enforced by ACMA. Compliance with the Standards is a license condition for all free-to-air commercial television broadcasters. The *Children's Television Standards* include some general restrictions on the content of advertising to children³⁷ and some restrictions on the amount of advertising that may be shown during certain 'children's viewing periods', but only one provision dealing specifically with advertisements for food³⁸. This provision prohibits advertisements that contain any misleading or incorrect information about the nutritional value of foods or beverages.

The *Commercial Television Industry Code of Practice* (administered by the free-to-air commercial television broadcasting industry) also contains only one provision dealing with food advertising to children. This provision applies only to ads directed to children for food or beverages that encourage or promote 'an inactive lifestyle' (defined as 'not engaging in any or much physical activity as a way of life') or 'unhealthy eating or drinking habits' (defined as 'excessive or compulsive consumption of food and/or beverages'). These provisions do not deal adequately with all the problems associated with television advertising of unhealthy food to children. They do not adequately restrict the volume of advertising of unhealthy food to children, or the range of techniques that advertisers use to influence children to consume unhealthy foods.

Advertising on subscription television (Pay TV) is also governed by an industry code of practice. The Australian Subscription Television and Radio Association (ASTRA) *Subscription Broadcast Television Code of Practice* is administered by the subscription television industry. This Code requires subscription television broadcasters to comply with the Australian Association of National Advertisers (AANA) *Food and Beverages Advertising and Marketing Communications Code*. However, the AANA Code is inadequate for dealing with food and beverage advertising to children for the reasons discussed below and in Appendix 1.

Other forms of marketing used to promote unhealthy foods to children (such as print, internet, cinema, billboards, direct marketing or point of sale promotions) are not currently governed by any legislation other than provisions in the *Fair Trading Act* (Consumer Affairs Victoria) and the *Trade Practices Act* (Australian Competition and Consumer Commission) to prevent misleading and deceptive conduct.

The Australian Association of National Advertisers (AANA) has set up a self-regulatory *Food and Beverage Advertising and Marketing Communications Code*, which purports to restrict inappropriate advertising and marketing of food and beverages in Australia, including advertising and marketing directed to children. This Code is inadequate for this purpose, however, because it does not restrict the volume (frequency, timing or location) of marketing of unhealthy food to children, it does not apply to all types of advertising and marketing (e.g. product packaging, marketing on company websites, or direct marketing (through SMS and email)), and does not adequately restrict inappropriate practices used to market unhealthy foods to children, e.g. the use of toys or celebrities to promote products.

Appendix 1 lists the specific concerns VicHealth has with current regulation

6. International Context

Many countries have statutory regulations that restrict or ban television food advertising aimed at children. Quebec in 1989 introduced legislation that bans all advertising (not just advertising of food) aimed at children. In the early 1990's, Sweden and Norway introduced bans on all television advertising to children. In February 2007, the United Kingdom's communications regulator (Ofcom) introduced restrictions on television advertising of foods deemed unhealthy (according to nutrient profile criteria) during programs considered to appeal to children younger than 16. More recently, a private members bill (*the Television Advertising (Food) Bill*) has been introduced in the United Kingdom parliament due to concerns that Ofcom's restrictions are inadequate because they do not apply during programs most popular with children. If enacted, the bill will ban all television food advertising between the hours of 5am and 9pm, unless specific nutrition requirements are met³⁹.

The International Obesity Taskforce have developed guiding principles for reducing the commercial promotion of foods to children (*The Sydney Principles*) to support countries in their attempts to improve children's nutrition and reduce rates of childhood obesity⁴⁰.

8. VicHealth Position

VicHealth believes current Australian advertising regulations are inadequate for dealing with advertising and marketing of unhealthy food targeting children. As part of a broad approach to promoting healthy eating, VicHealth believes a substantial restriction on commercial marketing of food and beverages to children is justified.

VicHealth is advocating for the introduction of comprehensive legislation to prohibit all forms of marketing and advertising of foods or beverages, other than healthy foods^b or beverages, directed to children, via television (free to air and subscription), print, internet, cinema, outdoor media, direct marketing (email, SMS or direct mail), sponsorship, product packaging, or point of sale promotions.

VicHealth will support programs, policy development and research efforts that advocate for:

8.1 Changes to the *Children's Television Standards* to enable **only** the promotion of healthy foods^b during times when significant numbers of children are likely to be watching television.

8.2 Introduction of state and commonwealth legislation to prevent other (non-television) forms of advertising and marketing of food and beverages (other than healthy food and beverages) directed to children.

8.3 Changes to the *Australia New Zealand Food Standards Code* to include eligibility criteria for nutrition claims.

8.4 Improved enforcement by Consumer Affairs Victoria and the Australian Competition and Consumer Commission of fair trading legislation in relation to food marketing practices that are misleading, deceptive or unconscionable (ie grossly unfair).

8.5 Improved monitoring (and stronger sanctions for breach) of relevant regulations to ensure incentives for food manufacturers to comply with regulations outweighs incentives to breach.

^b "Healthy food" or "Nutritious food" is considered by VicHealth to be any food or non-alcoholic beverage which meets the eligibility criteria for making a health claim, as per the nutrient profile model proposed by the Food Standards Australia New Zealand (FSANZ). This model takes into account the positive nutritional characteristics of a food (such as fibre, protein and fruit/vegetable content) as well as the less desirable attributes (such as energy, saturated fat, sodium and total sugars). It is an adaptation of a model used in the UK by Ofcom to restrict television food advertising aimed at children. It has been modelled on over 10,000 Australian foods and is proposed by FSANZ as the system for determining eligibility of a product for a health claim under planned legislative changes to the Food Standards Code. Further refinement may be required to ensure consistency with the *Dietary Guidelines for Children and Adolescents*; however this model offers a robust and accessible framework for inclusion in legislation.

Appendix 1: Inadequacy of Australian advertising regulations

The following statement has been compiled by the Victorian Obesity Policy Coalition^c and represents the view of VicHealth.

Children's Television Standards

The *Children's Television Standards* include some general restrictions on the content of advertising to children⁴¹ and some restrictions on the amount of advertising that may be shown during certain 'children's viewing periods'.

However, a major problem with the advertising restrictions in the Children's Television Standards is their limited application – they do not apply for the majority of time when children actually watch television. The general restrictions on the content of advertisements apply only to advertisements broadcast during P (pre-school children's) and C (children's) programs, which are programs that meet certain criteria relating to quality of production and suitability, entertainment and educational benefit for children. They do not apply to advertisements broadcast during programs popular with children that do not meet the P and C criteria, and/or are not submitted to ACMA for classification as a P or C program. Most of the highest rating children's programs fall into this category, for example, game shows, reality television programs, soaps, sport, family programs and some cartoons.

The Children's Television Standards prohibit advertising during 'P periods' and restrict the amount of advertising that may be broadcast per hour during 'C periods' to 5 minutes per half hour. However, P and C periods are defined as periods nominated by broadcasters during which they will broadcast P or C programs. This means that broadcasters can effectively choose the times during which the advertising restrictions in the Children's Television Standards apply, except that they must satisfy the quota requirements in the Standards for broadcasting P and C programs during 'P and C bands'⁴². Broadcasters are only required to broadcast P and C programs for a total of 390 hours per year, which equates to an average of 64 minutes per day. Therefore, in practice, the advertising restrictions are only likely to operate for about an hour per day. In addition, P and C programs are usually broadcast outside children's peak viewing periods. Most television stations broadcast C programs between 4pm and 4.30pm when the peak viewing time for 5-12 year old children is 6-8.30pm⁴³.

Commercial Television Industry Code of Practice

The Commercial Television Industry Code of Practice is an industry code of practice, developed and administered by the free-to-air commercial television industry (represented by Free TV Australia) according to a requirement in the *Broadcast Services Act 1992* (Cth). The Commercial Television Industry Code of Practice requires advertisements 'directed to children' to comply with the advertising provisions of the Children's Television Standards and contains one provision dealing with food and beverage advertising to children.⁴⁴ The provision states that advertisements directed to children for food and/or beverages should not encourage or promote an inactive lifestyle or unhealthy eating or drinking habits. However, 'inactive lifestyle' is defined as 'not engaging in any or much physical activity as a way of life' and 'unhealthy eating or drinking habits' is defined as 'excessive or compulsive consumption of food and/or beverages'. This means that the provision has little if any effect as it only applies to advertisements that encourage or promote not engaging in any or much physical activity as a way of life or excessive consumption of food and/or beverages. Few individual advertisements would encourage or promote either of these things. It is the cumulative effect of children's exposure to the huge volume of advertisements for unhealthy foods on television that is likely to lead children to consume unhealthy foods excessively, not exposure to a single advertisement that encourages excessive consumption. In addition, the Code only applies to advertisements that are 'directed to children'. It is likely that this would be interpreted narrowly to mean that the Code applies only to advertisements designed specifically for children, and not to advertisements intended for both children and adults, or to advertisements not specifically created for children, but likely to be watched by a significant number of children. In any case, the Commercial Television Industry Code of Practice has little impact in practice because it relies on a complicated complaints system and is difficult to enforce.

^c The Obesity Policy Coalition (OPC) is a consortium of Cancer Council Victoria, Diabetes Victoria and Deakin University. VicHealth has contributed funding to the OPC since 2006.

Australian Subscription Television and Radio Association (ASTRA) Subscription Broadcast Television Code of Practice

The *ASTRA Subscription Broadcast Television Code of Practice* is an industry code of practice, developed and administered by the Australian Subscription Television and Radio Association (representing the subscription television broadcasting industry), according to a requirement in the *Broadcast Services Act 1992* (Cth). The ASTRA Code contains only one provision dealing with food and beverage advertising to children, which requires broadcasters to comply with the *AANA Food and Beverages Advertising and Marketing Communications Code*. The AANA Code is discussed below.

Australian Association of National Advertisers (AANA) Food and Beverages Advertising and Marketing Communications Code

The AANA Food and Beverages Advertising and Marketing Communications Code is a self regulatory code developed and administered by the Australian Association of National Advertisers that purports to restrict inappropriate advertising and marketing of food and beverages in Australia, including advertising and marketing directed to children. VicHealth believes the AANA Food and Beverages Advertising and Marketing Communications Code is inadequate for dealing with food marketing to children for the following reasons.

First, the Code does not restrict the volume (frequency, timing or location) of marketing of unhealthy food to children. It is the huge volume of this marketing, more than individual instances of inappropriate or misleading marketing, that influences children to eat unhealthily. Second, the Code is limited in its application – it does not apply to product packaging or to marketing for which the food company does not pay a third party (for example, marketing on company websites, ‘advergaming’, or direct marketing through SMS and email). Third, the Code does not prevent most inappropriate practices used to market unhealthy food to children. For example, it does not prevent:

- use of popular characters and personalities (unless the use of a character or personality blurs the distinction between commercial promotion and program content);
- use of premiums (such as collectables, toys and competitions) that are ‘integral elements’ of products;
- use of techniques to mislead consumers to believe products are good for children or provide health benefits, such as associating unhealthy products with sport, exercise or healthy lifestyles, or selectively promoting certain nutritional characteristics of products without disclosing products’ unhealthy characteristics; or
- typical techniques used by advertisers to manipulate ‘pester power’ (i.e. techniques to make children want products so they will pester parents to buy them). The Code only prevents advertisements that explicitly or implicitly appeal to children to ask their parents or guardians to buy a product for them, which is not how advertisements typically manipulate pester power.

Fourth, compliance with the Code is voluntary and cannot be enforced. Complaints about breaches of the Code are investigated by the Advertising Standards Board, which is appointed and funded by the advertising industry. If the Advertising Standards Board decides that an advertisement breaches the Code, it can request the advertiser to modify or withdraw the advertisement, but it cannot compel the advertiser to do so.

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- ³⁷ For example, the Children's Television Standards includes prohibitions on advertisements that may mislead or deceive children, that are designed to put undue pressure on children to ask their parents to buy advertised products or services, or that state or imply that a product makes children who own or enjoy it superior to their peers
- ³⁸ Clause 19(6) of the Children's Television Standards
- ³⁹ HL BILL 41 (2007) Television Advertising (Food) Act (2007) accessed at <http://www.publications.parliament.uk/pa/ldbills/041/2007041.pdf>
- ⁴⁰ International Obesity Taskforce(2007) The Sydney Principles. Accessed at <http://www.iof.org/sydneyprinciples/>
- ⁴¹ For example, the Children's Television Standards includes prohibitions on advertisements that may mislead or deceive children, that are designed to put undue pressure on children to ask their parents to buy advertised products or services, or that state or imply that a product makes children who own or enjoy it superior to their peers
- ⁴² Broadcasters are required to broadcast P programs for a total of 130 hours per year, which must include at least 30 minutes each weekday during 'P bands' (between 7am and 4.30pm). They are also required to broadcast C programs for a total of 260 hours per year, which must include at least 30 minutes each weekday between 7am and 8am or between 4pm and 8.30pm to a total of 130 hours, and another 130 hours anytime during 'C bands' (between 7am and 8am or between 4pm and 8.30pm on weekdays or between 7am and 8.30pm on weekends and public holidays). This amounts to a requirement to broadcast P and C programs for an average of 64 minutes per day.
- ⁴³ Purchased from OzTam (Australian Television Audience Measurement), by Centre for Overweight & Obesity University of Sydney. Children's (5-12 year old) TV viewing for 5 Australian metropolitan cities. 2006.
- ⁴⁴ Clause 6.23 of the Commercial Television Industry Code of Practice